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FILED WITH THE  
COURT SECURITY OFFICER  
CSO-1  
DATE: 3/27/15

THE UNITED STATES DISTRICT COURT  
FOR THE EASTERN DISTRICT OF VIRGINIA

UNITED STATES OF AMERICA,

Plaintiff,

v.

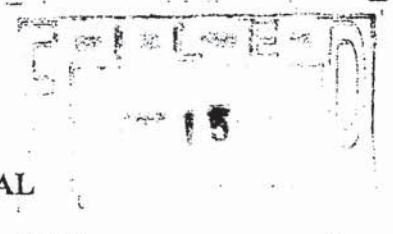
DR. ALI AL-TIMIMI, PH.D

Defendant.

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§

CR-04-385

UNDER SEAL



DEFENDANT DR. ALI AL-TIMIMI'S MOTION TO COMPEL DISCOVERY OF  
EVIDENCE BEYOND THE NARROW SCOPE OF THE GOVERNMENT'S PRIOR  
SEARCH OF NSA MATERIAL

Dr. Ali Al-Timimi, by counsel, respectfully moves for the government to be compelled to  
(1) disclose any withheld evidence held by the government as a whole and without the prior  
limitations on excluded dates; and (2) confirmation any undisclosed evidence involving the  
material parties and communications detailed in both the earlier defense discovery request as  
well as the attached memorandum of points and authorities.

Respectfully submitted,

Ali Al-Timimi, Ph.D

By Counsel

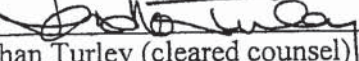
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# 269

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By:   
Jonathan Turley (cleared counsel)  
Dated: October 10, 2008

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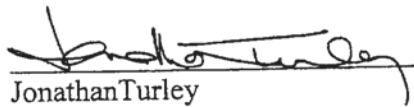
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**CERTIFICATE OF SERVICE**

I hereby certify that on October 15, 2008, a true and correct copy of the foregoing was served by court security staff upon:

Mr. Gordon Kromberg, Esq.  
Assistant United States Attorney  
2100 Jamieson Ave.  
Alexandria, Virginia 22314-5794

  
Jonathan Turley

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**CERTIFICATE OF SERVICE**

I certify that on this 27<sup>th</sup> day of March, 2015, I will file the foregoing document on the CM/ECF system, which will then send an electronic notification to:

Mr. Gordon Kromberg, Esq.  
United States Attorney's Office  
2100 Jamieson Ave.  
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*Attorney for the United States*

Pursuant to the Electronic Case Filing Policies and Procedures, a courtesy copy will be delivered to Chambers within one business day of this electronic filing.

/s/  
\_\_\_\_\_  
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